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Attorneys for Mark Dannels, Pat Downing, Kris Karcher, Shelly McInnes,
Raymond McNeely, Kip Oswald, Michael Reeves, Sean Sanborn,
Eric Schwenninger, Chris Webley, Anthony Wetmore, Craig Zanni,
David Zavala, City of Coquille, City of Coos Bay, Coos County, Oregon,
and the Estate of David E. Hall

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

Nicholas James McGuffin,
as an individual and as guardian
ad litem, on behalf of S.M., a minor,

Case No. 6:20-cv-01163-MTK
(Lead Case)

Plaintiffs,

v.

Mark Dannels, Pat Downing, Susan
Hormann, Mary Krings, Kris Karcher,
Shelly McInnes, Raymond McNeely,
Kip Oswald, Michael Reaves, John
Riddle, Sean Sanborn, Eric Schwenninger,
Richard Walter, Chris Webley, Anthony
Wetmore, Kathy Wilcox, Craig Zanni,
David Zavala, Joel D. Shapiro as
Administrator of the Estate of David E. Hall,

Unopposed
Motion for Limited Stay Pending
the Interlocutory Appeals of
Defendants Eric Schwenninger,
Craig Zanni, Kip Oswald, and
Kris Karcher

Vidocq Society, City of Coquille,
City of Coos Bay and Coos County,

Defendants.

Nicholas James McGuffin, as an
Individual and as guardian ad litem,
on behalf of S.M., a minor,

Case No. 3:21-cv-01719-MTK
(Trailing Case)

Plaintiffs,

v.

Oregon State Police,

Defendant.

LR 7-1 CERTIFICATION

PURSUANT TO LOCAL RULE 7-1, the undersigned hereby certifies that these moving Defendants have conferred with the Plaintiffs, by and through their attorneys of record in this matter at the telephone status conference in this matter on July 8, 2025, and by sending them a copy of the motion yesterday by email, and that the Plaintiffs have not indicated that they oppose this Motion.

MOTION

COME NOW, Kris Karcher, Kip Oswald, Eric Schwenninger, Craig Zanni, and Coos County by and through their attorney, Robert E. Franz, Jr., and hereby move the Court for an order staying all proceedings in this matter as to Defendants Kris Karcher, Kip Oswald, Eric Schwenninger, Craig Zanni, and Coos County pending the resolution of the interlocutory appeals of Defendants Kris Karcher, Kip Oswald, Eric Schwenninger, and Craig Zanni filed in the Ninth Circuit Court of Appeals relating to this Court's denial of qualified immunity as to Defendants Kris Karcher, Kip Oswald, Eric Schwenninger, and Craig Zanni. The granting of this Motion for a Limited Stay will not affect this Court's Jurisdiction to rule upon

any issues related to the settlements of Plaintiffs' claims with the other Defendants in this matter, including the jurisdiction to enter judgments and orders of dismissal.

The granting of this Motion for a Limited Stay is proper to avoid conflicting rulings and issues related to claim and issue preclusion, and is necessary to avoid the duplicative and inefficient use of this Court's resources and well as the resources of the parties.

Dated: Wednesday, July 9, 2025.

Respectfully submitted,

/s/ Robert E. Franz, Jr.

FRANZ & HENDERSON

Robert E. Franz, Jr.

OSB #730915

(541) 741-8220

Attorneys for Defendants

**Kris Karcher, Kip Oswald, Eric Schwenninger,
Craig Zanni, and Coos County**